



Office of Child and Family Services

Community Services Block Grant Program

Policies and Procedures Manual

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The CSBG State Office has assembled the following monitoring guides and checklists in an effort to provide comprehensive procedures for monitoring agencies that are awarded subcontracts under the Community Services Block Grant program. These guides and checklists are a work in process. As new ideas and innovative techniques and procedures emerge, both through "hands-on" use by our Program Specialists and Fiscal monitoring staff, as well as the continual training and collaborating with others throughout the year, the guides and checklists are modified in an effort to make the monitoring process as efficient and effective as possible.

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I. General Information

a. Background and Purpose

The Community Services Block Grant (CSBG) is federal funding from the U.S. Department of Health and Human Services (HHS) that was created through the Economic Opportunity Act of 1964 and is administered at the State and territory level. CSBG funding supports activities that help to reduce poverty, revitalize low-income communities, and empower low-income families and individuals to become self-sufficient. In Maine, CSBG funding is at the core of a network of Community Action Agencies (CAAs) which mobilize resources and communities to fight poverty. Through CSBG support, CAAs can respond to the causes and conditions of poverty by delivering services and strategies tailored to meet priority needs unique to their communities.

This CSBG policies and procedures manual describes certain general principles governing the Office of Child and Family Services' (OCFS) approach to the CSBG program. The manual outlines the tasks that OCFS generally undertakes to meet the objectives of the CSBG program, subject to the availability of resources and upon OCFS' evaluation of the totality of circumstances. It is not intended to be exhaustive. Certain additional program-specific protocols and provisions may be set forth in other plans, contracts, notices, or other directives as applicable.

This manual also includes forms, tools, dates, and other brief summaries of information which are provided for illustration purposes only. OCFS may issue updates and changes to these from time to time, without requiring the reissuance of this manual. As such, OCFS staff and the eligible entities should refer to current source documents.

b. Legislation and Guidance

The following legislation, guidance, and legal authority inform the CSBG policies and procedures described in this manual:

- [Coats Human Services Reauthorization Act of 1988 \(42 USC 9901 – CSBG Act\)](#)
- [CSBG Regulation 45 CFR 96](#)
- [Maine's Community Services Block Grant Program 10-144, Chapter 2](#)
- [Maine CSBG Revised State Statute](#)
- [Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards \(2 CFR 200 - OMB Super Circular\)](#)
- [Policy and Guidance issued periodically by HHS, Office of Community Services \(OCS\)](#)
(Information Memorandums, etc.)
- **Various State Laws, Regulations, OCFS IMs, and applicable contract provisions**

c. Administering Agency

In accordance with Section 676(a)(1) of the federal Community Services Block Grant Act, as amended (Pub. 105-285) (federal CSBG Act), the Governor of Maine has designated the Department of Health and Human Services (DHHS), Office of Child and Family Services (OCFS) as the lead administering agency of the CSBG program.

d. Eligible Entities

Only a duly designated eligible entity can receive CSBG funding. Currently Maine provides funding to ten (10) designated nonprofit eligible entities, also known as [CAAs](#), who provide a variety of community-based services, programs, and activities that promote self-sufficiency for low-income families and individuals residing in Maine.

Procedures and requirements for eligible entity designation are specified in Section 1.3 of the State Department Rules; Section 10-144; Chapter 2: [COMMUNITY SERVICES BLOCK GRANT PROGRAM](#). Among the requirements is that each entity must be governed by a tripartite board representing appointed leaders from the private sector, elected public officials or their representatives, and low-income individuals or representatives from the low-income community who reside in the designated service area.

e. Funding Formula and Allocation

Federal requirements stipulate that at least 90% of CSBG funds be passed through to the CAAs. In Maine, these funds are distributed to CAAs based on a historical formula. Planned and actual allocations to each CAA are specified in the two-year CSBG State Plan and Annual Report, respectively.

Of the remaining 10%, states can use up to 5% for administrative cost and the remaining funds for discretionary projects that help accomplish the statutory goals of CSBG.

Example Formula:

Est. Award	3,750,159.00
Administrative	187,507.95
Discretionary	187,507.95
90% Pass Through	3,375,143.10

Agency	Contract	% of contract funds	Based Allocation of 50% equal	Calculated Allocation based on low-income households in catchment area	Total Contract
Agency 1	CFS-19-70xx	9.48%	168,757.15	159,981.78	328,738.93
Agency 2	CFS-19-70xx	5.79%	168,757.15	97,710.39	266,467.54
Agency 3	CFS-19-70xx	13.83%	168,757.15	233,391.14	402,148.29
Agency 4	CFS-19-70xx	13.93%	168,757.15	235,078.71	403,835.86
Agency 5	CFS-19-70xx	19.12%	168,757.15	322,663.67	491,420.82
Agency 6	CFS-19-70xx	12.66%	168,757.15	213,646.55	382,403.70
Agency 7	CFS-19-70xx	4.03%	168,757.15	68,009.13	236,766.28
Agency 8	CFS-19-70xx	8.89%	168,757.15	150,025.11	318,782.26
Agency 9	CFS-19-70xx	3.37%	168,757.15	56,871.16	225,628.31
Agency 10	CFS-19-70xx	8.90%	168,757.15	150,193.86	318,951.01
TOTAL		100 %	1,687,571.50	1,687,571.50	3,375,143.00

II. State Plan

a. Overview

Pursuant to Section 676 of the federal [CSBG Act](#), OCFS is required to submit to Department of Health and Human Services (HHS) a state plan every two federal fiscal years. The CSBG State Plan provides program grantees information on how the State will distribute and allocate CSBG program funds, describes the State's plan to meet assurances required by the Act, and establishes state accountability measures required for the reporting period among, other things. The most recently approved State Plan is available on [OCFS Website](#), while related documentation and prior plans can be found in the OCFS shared CSBG Drive.

The State Plan is generally prepared by the Community Services Block Grant Coordinator and in collaboration with the Maine's CSBG Network. Prior to its submission to HHS, the Plan is reviewed for approval or edits as necessary by the OCFS Business Services Manager, OCFS Office Director, and/or DHHS Commissioner. Once approved, a public hearing must be scheduled to allow for public comment. After this process, The CSBG State Office certifies the report and submits it to HHS through the *Online Data Collection (OLDC)* system. Once the submitted State Plan is reviewed and approved, HHS issues an approval letter and Award letter.

b. Public Comment and Hearing

In accordance with the federal [CSBG Act](#), OCFS holds a public comment period and hearing in conjunction with the development of each state plan, as well as a legislative hearing every two years. Plans are due no later than 30 days prior to the beginning of the first fiscal year covered by the plan and are submitted to HHS through OLDC.

Prior to posting the draft plan, OCFS is committed to soliciting informal input from the CAA network through multiple means, including but not limited to; planning meetings, conference calls, emailed feedback and meetings with the state association's (MCAA) Executive Committee members. OCFS also generally analyzes and considers a variety of performance management data while developing the draft State Plan including: the CSBG Annual Report, responses to the ACSI Survey, and the vast amount of Community Needs Assessments, Strategic Plans and Community Action Plan documents that are available throughout the network.

The draft plan is routinely posted on OCFS's website, along with written notification of the public hearing date(s), time(s) and location(s). Testimony received at the hearing and timely

written comments received are considered, and any appropriate changes are made before the plan is finalized and submitted to HHS for approval.

For illustration purposes, the following is a sample timeline summary of the overall State Plan development process and approximate date ranges.

c. Development Process

The following is a timeline summary of the overall State Plan development process:

State Plan Development Year and approximate dates	State Plan - FY 1 and approximate dates	State Plan - FY2 and approximate dates
<ul style="list-style-type: none"> • <u>December</u> OCFS initiates State Plan development process • <u>January - February</u> Informal feedback from network collected and reviewed • <u>March</u> <i>Annual Report (prior State Plan progress) submitted to OCS</i> • <u>April</u> OCFS completes State Plan draft • <u>May</u> State Plan draft circulated for OCFS internal sign-off • <u>June - July</u> State Plan draft posted to DHCD website, 30-Day Open Comment Period & Public Hearing held • OCFS reviews public comments and revises Plan as needed • <u>August</u> State Plan circulated for OCFS internal sign-off • <u>September</u> <i>State Plan submitted to OCS by 9/1</i> 	<ul style="list-style-type: none"> • <u>October</u> Final State Plan posted to OCFS website (pending OCS approval) • <u>March</u> <i>Annual Report (prior State Plan progress) submitted to OCS</i> 	<ul style="list-style-type: none"> • <u>December</u> OCFS initiates State Plan development process; if there is a needed change. • <u>January - February</u> Informal feedback collected and reviewed • <u>March</u> <i>Annual Report (prior State Plan progress) submitted to OCS</i> • <u>April</u> OCFS completes State Plan draft • <u>May</u> State Plan draft circulated for OCFS internal sign-off • <u>June - July</u> State Plan draft posted to DHCD website, 30-Day Open Comment Period & Public Hearing held • OCFS reviews public comments and revises Plan as needed • <u>August</u> State Plan circulated for OCFS internal sign-off • <u>September</u> <i>State Plan submitted to OCS by 9/1</i>

*Note, that a 2nd year plan is optional

III. Results Orientated Management and Accountability

Section 678E(a) and the assurance under Section 676(b)(12) of the federal CSBG Act require States receiving CSBG funds and all CAAs in the State to participate in a performance measurement system. Maine has chosen to participate in the Results Oriented Management and Accountability (ROMA) System.

a. State ROMA Support

As part of our State participation in ROMA, OCFS aims to support our CAA network in utilizing the ROMA System through multiple means including, but not limited, to:

- ↗ Alignment of key State CSBG deliverables with ROMA principles and practices.
- ↗ Written guidance on completing Community Action Plans and the CSBG Annual Report, as well as subsequent reviews and written feedback from the state.
- ↗ Written guidance, training, and technical assistance on conducting the three-year community assessment and strategic planning process along with subsequent reviews and written feedback on CAA planning processes and submitted reports.
- ↗ Investment of CSBG discretionary funds in the MCAA Training and Technical Assistance Contract to train and provide ongoing support related to ROMA implementation, including coordination of the ROMA Implementer/Trainer certification process.

b. ROMA Cycle

ROMA is a system for continuous quality improvement enabling the Community Action network to measure, analyze, and communicate performance. "Implementation" of ROMA occurs in five phases: Assessment, Planning, Implementation, Achievement of Results, and Evaluation. The following graphic depicts how key CSBG deliverables in Maine align with these phases:



c. ROMA Reviews

State Accountability Measure 5S(ii) described in OCS [IM 144](#) directs States to provide eligible entities written feedback regarding their performance in meeting ROMA goals, within 60 calendar days of submitting the State's CSBG Annual Report.

In order to meet 5S(ii), OCFS provides written feedback to our eligible entities on their performance in meeting ROMA Goals multiple times throughout the year including at the Annual Report. Written feedback is typically provided through email and addresses any targeting concerns and/or need for adjustment identified during the review of each report. Similarly, upon receipt of each entity's draft Community Action Plan for the subsequent year, feedback is typically provided (based on prior performance) on National Performance Indicators (NPIs) selected and targeting.

The State's ROMA review is not intended to result in feedback and guidance on specific programs and/activities. It is, however, intended to result in feedback and guidance on how well the agency implements ROMA principles. For example, a ROMA review should consider questions such as:

- ↗ Is the Need/Goal, Strategy Statement of each program, initiative, etc. included in the CAP clearly stated?
- ↗ Do the services and strategies included in the CAP address needs identified in the agency's community assessment?
- ↗ Do the selected NPIs allow the agency to monitor progress meeting their goals? *(ex. – A shelter program has the main goal of helping families obtain housing but only selects the outcome measure: “number of households experiencing homelessness who obtained safe temporary shelter.” The program should also utilize the outcome: “number of households who obtained safe and affordable housing.)*
- ↗ Does the description identify measurement tools/processes to adequately track selected outcome(s)? *(ex. – An agency providing financial literacy classes using the outcome measure “number of individuals who achieved and maintained capacity to meet basic needs for 90 days” but has no means to follow-up with class attendees for 90+ days)*
- ↗ Are any of the actual NPIs reported in the Annual Report +/- 20% of what the agency targeted and if so, is there a comment that addresses the cause and/or plan to address the disparity? **(Note: In the context of ROMA, it is ok for an agency to fall short/exceed their target, so long as they are looking at and making adjustments based the data.)**

IV. Contracts

Annually, each CAA must execute a contract with OCFS for the administration of the CSBG Program. OCFS generally requires that executed contracts be returned by the end of September. The contracts consist of several documents including the Rider A Contract terms, Terms and Conditions required by the Division of Contract Management (DCM), a Scope of Services for the CAA's administration of the CSBG Program, the CAA's workplan and budget for the administration of the program, and other documents that are incorporated into the contract by reference.

Detailed information regarding the DHHS contracting process can be found at the Division of Contract Management website: <https://www.maine.gov/dhhs/contracts/>.

V. Community Action Plan

Section 676(b)(11) of the federal [CSBG Act](#) requires States to assure they will “secure from each eligible entity in the State, as a condition to receipt of funding” a community action plan inclusive of a community-needs assessment. To meet this assurance, Maine’s Regulations and relevant contract provisions require Maine’s CAAs to “develop and submit a Community Action Plan to the Department for review and approval” as a condition for funding. The Community Action Plan (CAP) is submitted to OCFS through email and summarizes a CAA’s work over the course of a contract year. According to the State Regulation the CAP must include the following:

- 1.) A workplan with administration and program objectives, activities, and performance outcomes including relevant detail on each project to be funded; and
- 2.) A CSBG budget.

The CAP process outlined below corresponds to OCFS’s annual CSBG contract process described elsewhere in this manual.

a. Annual Application and Contract

1. Approximately four (4) months prior to the start of program year, (about June) the CSBG State Office notifies the CSBG Network that the contract is being reviewed for any necessary edits, additions, deletions, etc., that will form the next contract. This is a mechanism to allow the agencies to have input on the following year, along with submitting the annual CAP.
2. Once the network agrees regarding Rider A of the contract, Maine’s Division of Contract Management (DCM) will conduct the contract process. CAAs are provided the final draft of the contract and must submit their completed workplans to the CSBG State Office and submit their budgets to DCM.
3. Upon submission, the CSBG State Coordinator generally completes a ROMA review of the CAP (as outlined in the next section), accepts the workplan and budget, and notifies the Contracts Administrator.

b. Reports on Progress

CAAs are required by their contracts with OCFS to submit Quarterly Reports regarding National Performance Indicator Results. Additionally, CAAs are required to submit four (4) quarterly fiscal reports regarding the operation of funded projects. All reports are due via email submission within 30 days after each reporting period ends, except for the last quarter of the year in which agencies have 60 days. Upon submission, the CSBG State Coordinator generally completes a ROMA review of the Quarterly NPI Reports (as outlined in section III. of this manual), Performance Measure Report, and the Provider Packet. In addition, DCM generally completes its own review and approval of quarterly fiscal reports.

VI. State Reporting

a. CSBG Annual Report

Section 678E of the federal [CSBG Act](#) requires States to annually prepare and submit a report on the measured performance of the State and the eligible entities in the State. Effective for the 2018 program year, the [CSBG Annual Report](#) replaced the Information System (IS) Survey as the tool through which States submit this report. Annual Reports are due approximately six (6) months after the prior program year ends and are submitted to HHS through their OLDC system. The Annual Report is generally prepared by the CSBG State Coordinator, with some sections completed by the CSBG Fiscal Representative or Finance Manager. The CSBG State Coordinator Supervisor reviews the annual report for approval or edits if necessary. Once approved, the CSBG State Coordinator submits the report in Grant Solutions Online Data Collection (OLDC) website at www.grantsolutions.com.

Similar to the IS Survey, the Annual Report also requires states to collect information from CAAs regarding the demographics of clients served, uses of CSBG funds, and CAA results for the prior program year. As a result, OCFS' contract requires CAAs to collect information, hold it in a secure and confidential manner that complies with relevant requirements, and submit this information to OCFS each year, approximately four (4) months after the prior program year ends. OCFS staff then complete a ROMA review (as outlined in section III. of this manual) and accept each agency report before submitting along with the statewide Annual Report to OCS.

b. Federal Financial Report (FFR) SF-425

Generally, the SF-425 for CSBG Block Grant funds is prepared by DHHS Service Center representative or Finance Manager using the "Federal Financial Report Instructions". The fiscal staff enters the report data into OLDC and saves a draft form. The draft is reviewed by Management at the Service Center for approval or edits if necessary. Once approved, Service Center certifies and submits the report in OLDC.

Submission Schedule: Annual. Each annual report must be submitted within 90 days following the end of each Federal Fiscal Year.

- ↗ An Initial report (covering Year 1 of the project period) is due 90 days following the end of Federal Fiscal Year 1;
- ↗ A Final report (cumulative, covering the entire 2-year project period) is due 90 days following the end of Federal Fiscal Year 2.

VII. Community Assessment Report and Strategic Plan

Among the CAA responsibilities specified in the federal [CSBG Act, 760 CMR 29.00](#), and in applicable contract provisions, is a requirement to conduct a community needs assessment. Effective 2015, further requirements were added under the Center of Excellence (COE) developed CSBG Organizational Standards, implemented in Maine pursuant to OCS [IM 138](#), including that CAAs must complete a community assessment and issue a report at least every three years. The COE Standards also require CAAs to complete a strategic plan at least every five years and that certain information collected during the community assessment be included in the strategic plan.

VIII. Monitoring

a. Purpose

Section 678B of the federal [CSBG Act](#) requires State CSBG Lead Agencies to establish “performance goals, administrative standards, financial management requirements, and other requirements” that ensure an appropriate level of accountability and quality among the State’s eligible entities. The federal CSBG Act also requires that State Lead Agencies perform a full on-site review of each CAA at least once during each three-year period, an on-site review of newly designated CAAs, and other reviews as appropriate. OCFS monitors CAAs in accordance with the federal CSBG Act, state regulations and statutes, contractual requirements, as well as IMs published by OCS.

On January 26, 2015, OCS published [IM 138](#) which stated that for States to meet the responsibilities outlined in the federal CSBG Act, they “must establish and communicate clear and comprehensive standards and hold eligible entities accountable according to the standards as part of their oversight duties.” OCFS, in collaboration with the State’s eligible entities and the State Association (MCAA), selected the Center of Excellence (COE) developed CSBG Organizational Standards for Private CSBG Eligible Entities as the comprehensive standards by which CAAs would be assessed annually.

b. Guiding Principles

OCFS follows the guiding principles endorsed by the National Association of State Community Action Programs in its approach to monitoring CAA compliance with the goals of the federal CSBG Act:

Mutual Respect

In working with sub grantee boards, staff, and consultants, OCFS values the unique knowledge, ability, and independence of each person. Mutual respect is of central concern to OCFS.

Open Communication

OCFS endeavors to keep lines of communication open and facilitate good working relationships with its partners. OCFS’s goals are to communicate frequently through a variety of tools and media, assist in developing solutions to problems, share program improvement ideas, and provide information on new developments in the anti-poverty field. OCFS is open to contact and is committed to listening to suggestions/concerns and to gaining an understanding of local operations and to assist its local partners in pursuing CSBG priorities.

Joint Problem solving

OCFS endeavors to promote an environment in which the agency and all the State's eligible entities will be open to change and working together in exploring options and developing mutually agreeable solutions.

c. Process Overview

OCFS monitors whether CAAs are meeting the goals of the federal CSBG Act through a multi-part process for each CAA which includes:

1. Reviewing three-year community assessment and strategic plan documents as well as annual Community Action Plans and Annual Report submissions (as outlined elsewhere in this manual)
2. Conducting annual desk level reviews of the Organizational Standards
3. Performing full on-site reviews, at least once during each three-year period and in accordance with a planned calendar.
4. Conducting ongoing reviews of fiscal activities and contract requirements
5. Conducting Board monitoring, including ongoing reviews of minutes and periodic meeting visits

Documents utilized for CSBG monitoring, including monitoring calendars, tools, and flowcharts outlining the process, are saved in the CSBG Shared Drive.

d. Monitoring Schedule and Risk Assessment

As part of the CSBG State Plan submitted to OCS, OCFS includes an estimated schedule for monitoring visits during the two-year State Plan period. Approximately four (4) months before the start of each program year, OCFS completes a risk assessment evaluation for each CAA, the results of which inform the final monitoring schedule for the next year. The current Risk Assessment Evaluation form is included for illustration purposes in the attached *Appendix B* of this manual and copies of previous evaluations are saved in the OCFS shared drive CSBG folder. Agencies are notified of scheduled monitoring through the processes specified in the Annual Organizational Standards Review and Triennial Review sections that follow.

e. Annual Organizational Standards Reviews

In accordance with OCS IM 138, OCFS assesses the status of CAAs in meeting all COE Organizational Standards annually. Per OCFS contract, self-assessments with supporting documentation are due January 1. Once Agency Self Assessments are submitted, OCFS staff conducts its desk-level review and validates CAA self-assessment responses. The validation process may include follow-up with a CAA to clarify documentation provided and/or discuss a Technical Assistance Plan (TAP) which gives the CAA the opportunity to move to a “Met” status on any standards OCFS determines are “Not Met”. The process closes with issuance of a monitoring report within 12 weeks of the CAA submitting their self-assessment and supporting documentation. The final report includes any TAP items negotiated between OCFS and the CAA.

Note: CAAs scheduled for triennial on-site monitoring are assessed similarly on the status of Organizational Standards but follow the process outlined in the next section. For both annual Organizational Standards reviews and triennial reviews, OCFS may collaborate efforts to assess the overall health of a CAA.

f. Triennial Reviews

OCFS’s triennial on-site monitoring provides an in-depth, point-in-time assessment of a CAA’s organizational capacity and compliance. To conduct on-site reviews, OCFS utilizes comprehensive in-depth monitoring and assessment tools, which incorporate the COE Organizational Standards, as well as state contractual and regulatory requirements. On-site reviews are structured to include areas which align with the COE’s three thematic groups and nine categories of standards for private, nonprofit eligible entities:

Maximum Feasible Participation

Category 1: Consumer Input and Involvement

Category 2: Community Engagement

Category 3: Community Assessment

Vision and Direction

Category 4: Organizational Leadership

Category 5: Board Governance

Category 6: Strategic Planning

Operations and Accountability

Category 7: Human Resource Management

Category 8: Financial Operations and Oversight

Category 9: Data and Analysis

Typically, the triennial monitoring process begins with the release of the current fiscal year *Agency Self-Assessment for Organizational Standards*. CAAs provide supporting documentation for these standards for OCFS's desk review.

Once the CAA submits their *Agency Self-Assessments*, OCFS conducts its desk-level review and prepares follow-up questions for the CAA on-site visit. The day of the on-site visit, OCFS meets with the agency to discuss the prepared follow-up questions and allows the agency to submit additional documentation to move to a "Met" status on any standards determined "Not Met". OCFS also performs a review of employee human resources files, client files, and various fiscal reviews on site as needed. After the on-site visit, OCFS completes its validation of the CAA's self-assessment, taking into consideration any additional information provided by the CAA.

A written, preliminary report, including findings, observations, and/or recommendations, will be provided to the EE electronically within 60 calendar days of the conclusion of the on-site review. Since the reviews are conducted in collaboration with DHHS' Division of Audit, OCFS will follow up with Audit regarding their review, to ensure any necessary feedback is incorporated. The EE will have the opportunity to comment on the content of the preliminary report. Comments must be received from the grantee within 30 business days upon receipt of the preliminary report. The comments may include additional documentation to address unmet standards and/or indicators. Upon receipt of comments, a final report will be prepared and issued to the EE. The final report will include comments received from the grantee.

Following the assessment process, if the State finds an EE is not meeting a standard or set of standards, the State's response will depend on the circumstances. In cases in which the EE may be able to meet an unmet standard in a reasonable timeframe, OCFS will prepare a Continuous Improvement Plan (CIP) listing recommendations for the unmet standards. The OCFS CSBG Grant Administrator and Fiscal Representative (if applicable) will verify progress made by the agency in carrying out the recommendations in the plan during regularly scheduled visits, meetings, phone conferences, etc.

In cases in which the EE may be able to meet an unmet standard in a reasonable timeframe contingent on some targeted, technical assistance, the State and EE may develop a Technical Assistance Plan (TAP) to target training and technical assistance resources and outline a timeframe for the entity to meet the standard(s).

If appropriate, the State may initiate action in accordance with section 678C of the CSBG Act (42 U.S.C. § 9915), including issuance of a Notice of Deficiency and the establishment of a Quality Improvement Plan (QIP) with clear timelines and benchmarks for progress.

*The failure of an EE to meet multiple standards, or in cases where one or more serious findings or deficiencies (including but not limited to, contractual non-compliance, non-compliance with Federal or State laws, non-compliance with agency bylaws, financial irresponsibility, failure to adequately provide services, conversion, fraud, corruption or abuse) may reflect deeper organizational challenges and risk. In those cases, OCFS will notify HHS, Office of Community Services and determine whether it may be necessary to take additional actions, including initiating action to reduce or terminate funding, in accordance with section 678C of the CSBG Act (42 U.S.C. § 9915; see also, CSBG IM 116, “Corrective Action, Termination, or Reduction of Funding,” issued May 1, 2012).

The current Triennial Monitoring Tool, *Maine OCFS CSBG Programmatic Monitoring and Standards Assessment Tool and Report*, can be found in the OCFS shared drive CSBG folder.

g. Fiscal Reviews

CAA fiscal reviews are generally conducted through multiple means. First, CAAs are required to submit quarterly fiscal reports illustrating budget versus actuals to OCFS throughout the contract year. These reports are reviewed and approved by DCM identified Point of Contact. Second, OCFS conducts annual reviews of Organizational Standards, which includes all standards in Category 8: Financial Operations and Oversight. Finally, fiscal monitoring reviews are conducted in accordance with *OMB Uniform Guidance 200.331 - Requirements for pass-through entities* via DHHS Division of Audit to evaluate subrecipient compliance with Federal Statutes, regulations, and the terms and conditions of their subaward.

h. Tripartite Board Monitoring

OCFS generally conducts tripartite Board monitoring through multiple means including: Quarterly Board Attendance Reporting, ongoing reviews of Board meeting minutes, periodic Board meeting visits, and reviews of Board governing documents submitted as part of annual Organizational Standards reviews and triennial assessments.

The following outlines specific processes that may be utilized for Board monitoring:

- ✓ **Selection and Composition** - OCFS monitors CAA compliance with Board selection and composition requirements specified in state regulation as well as Section 676B of the federal [CSBG Act](#) during annual Organizational Standards and triennial reviews.

Monitoring for each CAA includes two parts: 1) a review of the agency bylaws, and 2) a

review of agency compliance with their bylaws.

- ✓ **Board Minutes/Meeting Materials** – State regulation requires approved Board meeting minutes and materials (agenda, financial reports, etc.) “be submitted to the Department” prior to the meeting and after ratification of the minutes. CAAs upload and email board documents directly to the CSBG State Coordinator. CSBG State Coordinator reviews Board meeting information and uploaded materials submitted and asks any applicable questions to the agency.
- ✓ **Board Meeting Visits** – The CSBG State Coordinator generally attends Board meetings in conjunction with a scheduled triennial review process, and at a minimum, annually per agency.

IX. Training and Technical Assistance

As part of the CSBG State Plan submitted to OCS, OCFS includes a description of plans for delivering CSBG-funded training and technical assistance (T/TA) to CAAs during the two-year State Plan period. A report on actual assistance provided is submitted to OCS each year as part of the CSBG Annual Report. Additionally, in the fall of each year, OCFS and the State Association (MCAA) typically collaborate to complete a State T/TA Plan that is submitted to our Regional Performance and Innovation Consortium (RPIC) lead agency. Plans submitted to RPICs inform our national partner’s understanding of and planning for the CSBG Network’s overall investment in T/TA. OCFS and MCAA coordinate to ensure information reported in the CSBG State Plan and Annual Report aligns with information reported on the T/TA Plan submitted to the RPIC.

X. Discretionary Funds

As part of the CSBG State Plan submitted to OCS, OCFS includes a description of plans for the use of remainder/discretionary funds during the two-year State Plan period. A report on actual use of remainder/discretionary funds provided is submitted to OCS each year as part of the CSBG Annual Report. Information regarding spending is compiled by CSBG State Coordinator in conjunction with OCFS' Program Fiscal Officer. Both the State Plan and Annual Report include a breakdown of funding and activities for categories a.–h. listed below:

a. Training/technical assistance to eligible entities
b. Coordination of State-operated programs and/or local programs-
c. Statewide coordination and communication among eligible entities
d. Analysis of distribution of CSBG funds to determine if targeting greatest need
e. Asset-building programs
f. Innovative programs/activities by eligible entities or other neighborhood groups
g. State charity tax credits
h. Other activities

At this time, Maine contracts remaining discretionary and administration funds for training and technical assistance purposes to the Maine State Association. However, many states provide the discretionary funding to the agencies for special work to be conducted. Maine could utilize the contract process for remainder/discretionary funding as stated below:

1. Potential grantees submit written requests for funds to the OCFS State Coordinator who reviews and makes a determination with other staff present. Requests are accepted on a rolling basis and must include at a minimum an explanation of the need for the project, a project description, a tentative work plan, and budget.
2. When an award is made, a workplan and budget is created and submitted as an amendment to the original contract.
3. Upon receipt of each quarterly report and fiscal reports, each agency will submit an update of special project.

XI. Internal Controls

The policies and procedures outlined above are specific to CSBG. For further details on internal controls applicable to the entire Department of Health and Human Services, refer to the DHHS Division of Audit; <https://www.maine.gov/dhhs/audit/index.shtml>.

XII. Appendices

Appendix A – OCFS CSBG Risk Assessment Evaluation

Subrecipient Name: _____

Assessment Completed By: _____

Assessment Approved By: _____

Date Approved: _____

Grant Name(s) - CFDA(s) applicable to subrecipient	<input type="checkbox"/> CSBG – 93.569
<i>Date of last monitoring visit (if applicable):</i>	<i>Click here to enter text.</i>

RISK ASSESSMENT	CSBG
1. Has the subrecipient’s key personnel (i.e., ED/CEO, Deputy/COO, CFO/Fiscal Dir., HR, Planner, etc.) changed since the last monitoring?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Have more than two funding cycles (CSBG) passed since the subrecipient had an on-site monitoring visit?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Were there findings/violations from the last monitoring that indicate a higher level of risk*, or were there recurring unresolved findings reported from previous monitoring? <i>*Findings indicating a higher level of risk may be result of a OCFS monitoring visit or outside audit (e.g. Office of the Inspector General, State Auditor, and Government Accounting Office). High risk findings include those that could have significant impact on subrecipient’s program compliance, including client/vendor payments, eligibility determinations, and benefits received.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. Is the subrecipient new to operating these program funds for OCFS (has not done so within the past year)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. Did the subrecipient fail to submit the Single Audit report to OCFS within 180 days of the end of the subrecipient’s fiscal year?	
6. Were there any findings reported in the most recent Single Audit report (see Summary of Auditor’s Results page included in the attached Single Audit Report)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>If any “YES” responses were selected in the applicable Grant column, the subrecipient’s assessment should be “High Risk”</i>	<input type="checkbox"/> Low Risk <input type="checkbox"/> High Risk
<i>If a “YES” response was selected but subrecipient is not considered to be “High-Risk,” please explain:</i>	
<i>Based on results of this assessment and other factors, type of monitoring to be performed:</i>	<input type="checkbox"/> Desk Review <input type="checkbox"/> On-site <input type="checkbox"/> Both

This form is only for the internal use of OCFS staff working with the CSBG program

Appendix B – Checklist for Planning the On-Site Visit

1 – PROGRAM SPECIALIST SENDS ENGAGEMENT LETTER WITH APPROPRIATE ENCLOSURES

- Engagement Letter
- Draft Agenda
- List of Requested Documents
- Agency Profile
- Monitoring Tool that includes;
 - Organization Standards Assessment
 - Financial Assessment
 - Board Questionnaire
 - and inquiry topics
- Requested Documentation can be, but not limited to:
 - Documents, data, and systems to be returned with the questionnaire;
 - ✓ Most recent Board Roster
 - ✓ Most recent board Minutes
 - *Documents, data, and systems to be made available for onsite monitoring as they related to CSBG*
 - ✓ Most Recent CSBG Application and work plan
 - ✓ Award notification(s) and copy of executed contract/amendments
 - ✓ Client eligibility requirements
 - ✓ Documentation of participation by low income and or homeless individuals in the planning process.
 - ✓ Documentation of current corrective action plans and audits with accompanying descriptions of progress to date, if applicable.
 - ✓ Agency service referral list (for review)
 - ✓ List of all client files for the monitor to choose from.
 - ✓ Copy of the latest employee and Director’s evaluation/appraisal.
 - ✓ Documents related to any termination of federal or state funding in the last year
 - ✓ If there are changes, please provide the new organizational Chart that relates to the department or agency carrying out the CSBG.
 - ✓ Board member packet
 - ✓ Employee policies and procedures

2 - OTHER PRE-VISIT PREPARATORY TASKS:

Review pertinent materials in the agency’s contract file including:

- The contract and any applicable amendments
- CSBG Work Plan/Scope of Work
- Approved budget by categories
- Progress & financial reports

Review the following board documents

- Last year’s board roasters
- Last year’s board minutes
- Last year’s board by-laws

Note timeliness of agency's submission of required reports, review previous site visit reports including any follow-up documentation, review agency's most recent independent audit report and any other available monitoring reports such as Head Start.

Gather all forms, instruments, and other information needed for the site visit, such as monitoring tools, checklists, client list for programmatic and administrative points and guide.

3 – Complete Pre-Visit Monitoring Tool and Finalize Agenda

- ❑ Complete Pre-Visit Tool
- ❑ Make Notes of unknown areas to complete during the visit
- ❑ Finalize agenda based on Pre-Monitoring Questionnaire
- ❑ Send finalized agenda to agency

Appendix C – Sample Site Visit Notification Letter

Agency Name
Name
Chief Executive Officer
Agency Name
Address
City, ME Zip code

Re: **FY CSBG Monitoring Notification Confirmation Letter**

Dear *Insert Name Here*:

The Office of Child and Family Services (OCFS) will be conducting an on-site monitoring visit with your agency regarding the Community Services Block Grant program for **fiscal year 20XX**. The visit is scheduled for **July XX and XX, 20XX**. We appreciate your cooperation and partnership in the CSBG networks efforts to maintain quality services and standards.

Attached to this letter you will find the following documents:

- ✓ Agency Profile (please have available for our visit)
- ✓ Monitoring Tool which includes a list of the organizational standards and correlation documentation you should have ready for our review.
- ✓ List of other documentation to have ready for our review (these documents may be reviewed during or after the visit).
- ✓ Tentative CSBG Site Review Agenda

This on-site visit should take most of two business days. The purpose of this visit is to review and discuss the following documents for program compliance:

- ✓ Your agency's current program application/work plan/amendments
- ✓ Award notification(s) and executed contract
- ✓ Any relevant correspondence regarding the CSBG contract
- ✓ Any financial reports related to this fiscal year funding
- ✓ For review and discussion – progress reports, client files and other documents pertaining to this program

The following are instructions regarding the preparation and assessment of the Organizational Standards issued by the Federal OCS:

- 1- Each CAA is responsible to review each Standard and prepare the documentation that is required.
- 2- Each question will be verified by the OCFS State Coordinator using required documentation.
- 3- If there are standards that your organization believes it cannot meet due to a lack of capacity, resources, please inform OCFS prior to or at the monitoring visit.

The State CSBG State Coordinator is requesting that the following individuals be available to participate during the time of the monitoring, if possible:

- ❖ Agency Executive Director/CEO
- ❖ Financial Manager or equivalent
- ❖ HR Manager or equivalent
- ❖ CSBG Program Manager or equivalent,
- ❖ Other staff who are billed to CSBG

Lastly, if you have any governing/advisory board meetings during the dates of the review, please let me know.

I am looking forward to meeting with you, your staff, and any board members you wish to be in attendance for this visit. Please feel free to call me if you have any questions or concerns regarding my upcoming visit.

Sincerely,

Christa Elwell, LMSW
Business Services Manager
Maine Department of Health and Human Services
Office of Child and Family Services
#11 State House Station
Augusta, ME 04333-0011
Telephone (207) 724-7900
Christa.elwell@maine.gov

Appendix D - CSBG Agency Profile

(to be filled out by EE)

General Information:

Agency Name:	
Main Office Address:	
Main Office Town, State, Zip	
DUNS Number:	
Telephone Number:	
Fax Number:	
Web Address	

Administration:

Executive Director/CEO	
Email	
CSBG Point of Contact	
Email	
Chief Fiscal Officer	
Email	
Board Chair	
Email	

Fiscal Information

Contract Number	
Total Agency Annual Budget	
CSBG Annual Allocation:	

Current Assets-to-Current Liabilities Ratio: _____

Personnel: (Attach agency-wide organizational chart)

Total Full Time Staff	
Total CSBG Funded FT Staff:	
Total Part Time Staff	
Total CSBG Funded PT Staff:	
Total Program Volunteers	
Average Annual Volunteer Hours	

Facilities:

Years at current location:		
<input type="checkbox"/> Rent	<input type="checkbox"/> Own	<input type="checkbox"/> Lease
Is the building owned by a subsidiary/delegate?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If owned, are there other tenants in the building?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If So, Who are the tenants?		

List name and locations of other offices, neighborhood/outreach centers, Head Start Sites, and delegate agencies:

Name:	Address:

Service Delivery:

Date the most current Community Needs Assessment was completed:	
Was an update completed? If so, date?	
Date the most recent Strategic Plan was completed:	
Name of Counties being served by agency?	

Indicate which population(s) your organization serves with CSBG funds (676(b)(1)(A)):
<input type="checkbox"/> Low-income individual and families
<input type="checkbox"/> Homeless individuals and families
<input type="checkbox"/> Migrant or Seasonal individuals and families
<input type="checkbox"/> Elderly low-income individuals and families

Indicate which Federal Objectives are being met through CSBG program operations:	
<input type="checkbox"/> Employment	<input type="checkbox"/> Emergency Services
<input type="checkbox"/> Education	<input type="checkbox"/> Linkages
<input type="checkbox"/> Income Management	<input type="checkbox"/> Self-Sufficiency
<input type="checkbox"/> Housing	<input type="checkbox"/> Health

Indicate which National Goals are being met through CSBG program operations:
<input type="checkbox"/> Low-income individual and families
<input type="checkbox"/> Homeless individuals and families
<input type="checkbox"/> Migrant or Seasonal individuals and families
<input type="checkbox"/> Elderly low-income individuals and families

How are services and activities provided to low-income people?

Direct Services and Activities?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Direct Services through partnering agencies?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If so, how many partner agencies?		
List partner agencies:		

Briefly describe the collaboration that occurs to address poverty issues throughout the various areas served:

Comments: *(Note any special circumstances such as agency restructuring, transition of leadership, financial difficulties, or staff turnover, etc. that should be taken into consideration during the assessment.)*

Briefly describe, what is the agency's current assessment of its progress towards accomplishing the objectives of its CSBG related programs as stated in the Application and Work Plan?

Does the agency have adequate staff assigned to administer the CSBG program activities effectively and efficiently?

What skills gaps, if any, is the agency experiencing in its staff?

What is the morale of the staff in your organization? How is morale measured? What is the staff turnover rate over the past 5 years? (list rates by year)

What services does your agency offer that are duplicated in your service area?

Describe how an individual experiencing poverty uses your services and comes out more economically stable and is no longer considered in poverty? (Please provide a general flow of how this happens and two examples of how this has happened)

Please list any current Corrective Action Plans (CAPL), Technical Assistant Plans (TAP), Quality Improvement Plans (QIP), or unresolved findings (UF) or compliance issues previously brought to the agency's attention that are unresolved or have been resolved since the last monitoring visit. These plans and findings will result from monitoring or Organizational Standard Assessments.

Appendix E – Board Monitoring Tools

Reporting	Yes	No	Comments:
Is the agency submitting reporting per contract terms?			
Quarterly Financial Reports			
Quarterly NPI Results Reports			
Quarterly Performance Measure Reports and Provider Packets			

Agency Tripartite Board	Yes	No	Comments:
Does CSBG State Office have a copy of the most recent Board roster?			
Does the Board roster include the name, title, address, sector represented, date appointed or elected, and term expiration date (if applicable) for all Board members?			
Does the Board consist of 1/3 "Recipe" Stated in the State Statute and CSBG Act: "Each community action agency shall establish a governing board of directors, which must consist of not less than 15 nor more than 30 members. <u>One third</u> of the members must be representatives of low-income residents of the service area who are selected through a democratic process in accordance with guidelines established by the bureau. <u>One third</u> of the members must be elected public officials or their designees or officials of public agencies operating in the service area. <u>One third</u> of the members must be representatives of private sector organizations, including business and industry, as well as educational, civic, labor and religious organizations. All meetings of the board of directors must be in accordance with the freedom of access laws."			
Do By-laws specify a method for selection that is appropriate for each Board sector? (review by-laws)			
Do By-laws state that written advance notice, including an agenda, shall be given to the Board members and CSBG State Office at least 5 days in advance of Board meetings? (Review By-Laws)			
Have all Board Agendas been submitted to CSBG State Office 5 days prior to the board meeting?			
Have all Board Minutes been submitted to CSBG State Office within 15 business days of ratification?			

Board Minutes	Yes	No	Comments
Do the Minutes Contain the Following:			
Date, Time, Location			
Regular or Special Meeting			
Number and Name of Attendees			
Presence of a Quorum			
Guests in Attendance			
Action on Minutes			
Major proposals and the actions taken			
Treasures Report			
Major Discussions			
Executive Committee Reports			
Compensation and Performance Management Decisions			
Do Minutes list Board members in attendance & absent?			
Do the Minutes indicate that the agency's Board fully participates in the development, planning, implementation, and evaluation of the CSBG program?			
Do the Board By-laws establish procedures under which a low-income individual or organization serving low income individuals may petition for adequate representation?			
Agency Capacity and Financial	Yes	No	Comments
Are all staff positions identified in the CSBG Contract application, and any amendments thereto, filled?			
Is the agency gathering and tracking all information needed to complete the CSBG program reports?			
Are program outcomes sufficiently documented?			
If reported expenditures exceed budgeted amounts by line item, has the agency requested an amendment to the original budget and/or provided adequate explanation for any significant variances?			
Are expenditures reported by the agency to date within the budgeted amounts by category per the contract?			

CSBG Eligible Entity Board Meeting Attendance Report

Agency:	
Contract #:	
CSBG State Program Representative:	

Meeting Called to Order (date/time):	
Meeting Chaired by:	
Current Size of Board:	
Total # present:	

Were meeting notice, agenda, & minutes distributed prior to the meeting?	
How far in advance?	
Was attendance taken?	
Title of person keeping attendance:	
Was a quorum present?	

Were meeting minutes of previous meeting reviewed and approved?	
If applicable, were corrections made to previous minutes?	
Presentation of report (written, oral)	

Briefly describe the topics of the Executive Director's Report:	
Recommendations for Board Actions:	

Financial Report	
Is the Board provided with current financial information?	
Highlights:	

Committee Reports	
Which Committee?	
Highlights:	
Which Committee?	
Highlights:	

* Add Additional if needed

Program Reports	
Which Program?	
Highlights:	

*Add Additional if needed

Old/New Business	
Topic (s):	
Highlights:	

Time Adjourned: _	
Was the prepared agenda followed?	

Program Representative Comments/Observations:

Appendix F – Sample Client Records Review Tools

**Staff that may be involved: Program Manager and/or Case Manager*

SUMMARY OF REVIEW OF CLIENT FILES Address the following questions after reviewing a sampling of client files:	Yes	No	N/A	Comments
Are client files complete, on-site, and available for inspection by OCFS staff				
Request 5-10 client files for review. Utilize the CSBG Records Review Worksheet (at the end of this document) for each file.				
Do client files, at a minimum, contain the following documents and information:				
Intake application (including demographic data)				
Household income				
Gross income for all household members over 18				
Source documentation for determining income and income types and amounts				
Calculations used to determine annualized gross income				
Type of service or assistance				
Date(s) of service				
A plan for moving the client toward self-sufficiency				
Follow-up information				
Review of service(s) provided and impact on the individual or family				
Referrals and follow-up				
Current poverty guidelines				

Did the review of the client files sampled indicate that all clients provided services were eligible?				
If not, indicate the number of clients determined ineligible and/or unverifiable in each service category.				
Is there evidence that applicants were apprised of grievance procedures if services were denied?				
Is a client file maintained for each person served?				
Does the form used for determining client eligibility identify all eligibility criteria and the documentation used in making the determination?				
For clients receiving direct services, is income documented for all members of the household 18 years and older?				
Is there evidence in the client files reviewed that the agency has procedures in place to verify income amounts and family size as stated in the application?				
Does the agency limit eligibility to clients at or below 125% of the HHS poverty guidelines?				
Are proper procedures in place for case management, and is adequate client information and follow-up documented?				
Does the agency link with other programs in the community when services required are beyond the agency's scope?				
Are persons first-time served and service units being counted correctly?				
Is the agency taking appropriate steps to ensure privacy and confidentiality of client information, such as secure files, confidentiality policies, private consultation space, etc.?				
Are client records maintained for at least three years?				
Did the review of the documentation indicate that the services have impacted on client self-sufficiency?				

CSBG Client Records Review Worksheet

	Client #							
Review an adequate number of client file that are randomly picked from a list of client files provided by the agency.	Yes	No	Yes	No	Yes	No	Yes	No
Are the client demographic characteristics adequate (Age / Ethnicity / Gender / Education / Household / Relationship status)?								
Is income documented for all members of the household 18 years and older?								
Are the documents used to verify income appropriate and allowable?								
Is the client above or below the 125% (do the calculations)?								
Does the file contain information regarding types of assistance and dates of services provided?								
Is there a log describing the nature of the services provided, including the date and amount of such services?								
Are copies of the payment method retained in the file for services provided (bill, voucher, copy of check, etc.)?								
Are the services that CSBG was billed for consistent with the program narrative and scope of work?								
Are service follow-ups documented?								
Was the client referred to other agencies for services that the CAA could not meet?								
Are these referrals documented?								
If the client was served for a year or more, did the agency obtain a new application 12 months after the origination of services?								
Are case management activities documented?								
Are there stated goals for sustainability for services offered more than twice?								
Is there evidence that the stated goals are or were achieved?								
Does the client signature section of the intake form include a self-declaration statement that the information provided is true and correct?								

